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August 24, 2015

Hon. Michael H. Simon
U.S. District Judge
Mark O. Hatfield U.S. Courthouse
1000 S.W. Third Ave.
Portland, OR 97204

Re: U.S. v. Carolyn M. Knudsen - Cause No. 14-CR-00355-001-SI

Hon Michael H. Simon:

On September 3, 2014, Carolyn M. Knudsen ("Ms. Knudsen") was indicted with one count of Aggravated Sexual Abuse, one count of Transportation of a Minor for Criminal Sexual Activity, one count of Production of Child Pornography, and one count of Production of Child Pornography by a Parent. After negotiations between Ms. Knudsen and the U.S. Government ("Government"), a plea agreement ("the Agreement") was reached, and, on May 6, 2015, Ms. Knudsen entered a plea of guilty to one count of Transportation of a Minor for Criminal Sexual Activity.

The terms of the Agreement were that, in exchange for entry of the guilty plea, the Government will dismiss the other three counts against Ms. Knudsen, one of which carries a mandatory sentence of 30 years imprisonment. Additionally, the Government will recommend a sentence of 25 years (300 months) in prison, which is below Ms. Knudsen's recommended sentencing guideline, followed by 10 years on supervised release. Also in exchange for pleading guilty, the Government, the District Attorney's Office for Multnomah County, and the Prosecuting Attorney's Office of Clark County, state of Washington

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agreed to not pursue additional charges arising out of the investigation, provided that Ms. Knudsen receives a sentence that carries at least 25 years in prison. Furthermore, the Government also agreed to recommend that Ms. Knudsen serve her jail time in a minimum security facility in Dublin, California. We think this is a very fair offer, and here is why.

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During the arms-length discussions between the Government and Ms. Knudsen regarding a resolution to the instant matter, Ms. Knudsen made the Government aware of several mitigating circumstances. These circumstances include Ms. Knudsen's low IQ and poor cognitive skills, Ms. Knudsen suffers from multiple sclerosis, Ms. Knudsen exhibits a pervasive pattern of social and interpersonal deficits, such as being socially inept, isolated, and reclusive, and Ms. Knudsen exhibits diminished emotional expressions and erotomanic delusions. Additionally, one or more of the conditions and/or disorders from which Ms. Knudsen suffers made it possible that Ms. Knudsen was manipulated into committing the acts that are the basis of this criminal matter. We believe that these mitigating circumstances justify the below-the-guideline sentencing recommendation of 25 years imprisonment, as well as the recommendation that Ms. Knudsen serve the 25 years in the facility in Dublin, California.

In preparation for sentencing in this matter, a pre-sentence report was made. The pre-sentence report identifies the evidence that the Government would present at trial to prove that Ms. Knudsen committed the crimes of Aggravated Sexual Abuse, Transportation of a Minor for Criminal Sexual Activity, Production of Child Pornography, and Production of Child Pornography by a Parent. We believe that the identification and characterization of said evidence made in the pre-sentence report is fair. Moreover, should this matter go to trial, and this evidence be presented, we have substantial doubt that Ms. Knudsen would prevail on the theories that counsel for Ms. Knudsen have investigated. Furthermore, upon being convicted of all of these charges, Ms. Knudsen would be exposed to a significantly higher guideline sentencing range, and, ultimately, would receive a sentence that is higher than the current recommendation that the Government agreed to make.

As mentioned above, if Ms. Knudsen is sentenced to at least 25 years of imprisonment in the instant matter, the Multnomah County District Attorney's office and the Clark County Prosecuting Attorney's Office will not pursue further criminal causes of action against Ms. Knudsen. We believe that this is a very important term of the agreement. For example, if Clark County Washington were to try Ms.

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Knudsen for rape of a child, or child molestation she could face being sentenced under Washington's Persistent Offender Act requiring a mandatory life sentence without the possibility for release. Similarly, Ms. Knudsen would likely face a sentence of more than 25 years if tried for her crimes in Multnomah County, Oregon. Under the current plea agreement Ms. Knudsen may have opportunity to be released from prison in her lifetime.

On behalf of Ms. Knudsen, we ask the court to please consider the recommendation to which the Government and counsel for Ms. Knudsen agreed and impose the recommended sentence upon Ms. Knudsen.

Yours Very Truly,

Erin Bradley McAleer Law
Attorney for Ms. Knudsen

Travis M. O'Neal
Attorney for Ms. Knudsen